



NIXON PEABODY LLP
ATTORNEYS AT LAW
NIXONPEABODY.COM
@NIXONPEABODYLLP

Daniel A. Schnapp
Partner
T 212-940-3026
dschnapp@nixonpeabody.com

Tower 46
55 West 46th Street
New York, NY 10036-4120
212-940-3000

March 10, 2020

VIA ECF & EMAIL
(Failla_NYSDChambers@nysd.uscourts.gov)

The Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, New York 10007

RE: Commissions Import Export S.A. v. Republic of the Congo et al., 1:19-mc-00195-KPF

Dear Judge Failla:

We represent Respondent Ecree LLC (“Ecree”) in the above-referenced matter. Pursuant to Your Honor’s Individual Rules of Practice in Civil Cases Rule 4(E), we respectfully request that the Court schedule oral argument in connection with Ecree’s Motion to Vacate Certificate of Default, filed February 21, 2020 (Dkt. 56). Petitioner Commissions Import Export S.A. (“Commisimpex”) submitted its response on February 28, 2020 and Ecree submitted its reply on March 6, 2020. All briefing on Ecree’s motion has been completed.

Thank you for your consideration of this request.

Respectfully Submitted,

By: /s/ Daniel A. Schnapp
DANIEL A. SCHNAPP

Counsel for Ecree LLC

cc: Counsel of record by ECF